

REMARKS

In response to the Office Action dated October 24, 2002, Applicant respectfully requests reconsideration and withdrawal of the rejections of the claims. The indication that claims 4-6 contain allowable subject matter is noted with appreciation. The re-writing of those claims in independent form is being held in abeyance, pending consideration of this response.

The disclosure was objected to, on the grounds that the word "microprocessor" was misspelled in the replacement paragraph beginning on page 8, line 24, submitted in the Amendment filed July 24, 2002. A new replacement paragraph is being submitted herewith, to correct that error.

Claims 1, 2, 7 and 8 were rejected under 35 U.S.C. §103, on the grounds that they were considered to be unpatentable over the Tushie et al patent in view of the Sehr patent. Claim 1 recites a smart card customizing system that comprises three main components, namely a customizing machine equipped with a customizing station, a customizing data server, and a management interface. The management interface is connected to both the customizing machine and the data server by means of a bi-directional link, and operates to receive requests for customizing data from the customizing machine and transmit them to an available server upon receipt, as well as to receive the corresponding responses from the server and transmit them to the requesting customizing machine.

In response to Applicant's previous amendment traversing the rejection, the most recent Office Action refers to Figures 1C of the Tushie patent, and states that the card issuer management system 150 corresponds to the claimed customizing machine, the

reports 154 correspond to the claimed data server, and the card issuer management system interface 101 corresponds to the claimed management interface. It is respectfully submitted, however, that this interpretation of the Tushie patent does not support the rejection of the claims. In particular, claim 1 recites that the management interface receives requests from the customizing machine and transmits them to at least one of the servers. The management interface also receives the corresponding response from the server and transmits it to the requesting customizing station. Thus, in the context of claim 1, the management interface functions as a communication gateway between the customizing machine and the data server. Both the requests from the customizing machine and the data responses from the server are received by the management interface, and from there are transmitted to the other of the two components.

There is no disclosure that the card issuer management system interface 101 of the Tushie patent operates in the same manner. In particular, there is no disclosure that data presented by the reports 154 are received at the card issuer management system interface 101, and transmitted to the card issuer management system 150. Rather, as illustrated in Figure 154, the information in the reports is communicated directly to the card issuer management system 150. Further in this regard, the Tushie patent describes the function of the reporting capability 154 is "so that the card issuer can review statistical information maintained by the system 100." In other words, the reporting capability 154 is a "user" interface that enables the card issuer to review data. As such, there would be no reason for the card issuer management system interface 101 to receive this data. Consequently, there is no reason to employ bi-directional links between the reporting capability 154 and the

card user management system interface 101. For at least this reason, therefore, it is respectfully submitted that the Tushie patent does not suggest the subject matter of claim 1, nor dependent claims 2-12, whether considered alone or in combination with the Sehr patent.

Another feature of the invention recited in claims 9-17 is that a plurality of customizing stations and/or a plurality of devices that deliver customizing data are each connected to the management interface, via respective data links. The rejection of these claims acknowledges that the Tushie patent does not disclose such a concept, and relies upon the newly-cited Stimson et al patent for its disclosure of a plurality of data terminals. The rejection alleges that the plurality of data terminals are analogous to a plurality of customizing stations, and therefore concludes that it would be obvious to employ a plurality of customizing machines in the system of Tushie patent.

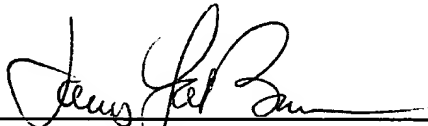
Even if such a modification were made to the system of the Tushie patent, however, the result would not be the same as the presently claimed invention. For instance, claim 13 recites a plurality of customizing stations and a plurality of devices that deliver customizing data. It further recites that the management interface is connected to *each* of the customizing stations via *respective* serial links and to *each* of the data delivery devices via *respective* serial links. In other words, each customizing station and each data delivery device has its own link to the management interface. Claim 13 further recites that the management interface is responsive to requests received from the customizing stations to deliver them to an available one of the data delivery devices, and to transmit customizing data delivered by the devices to the requesting customizing stations. Merely replicating the

card issuer management system 150 of the Tushie et al system would not result in this claimed arrangement. More particularly, as noted previously, the Tushie patent does not disclose a management interface which functions as a gateway between customizing stations and data delivery devices in the manner recited in the claim.

For at least the foregoing reasons, it is respectfully submitted that all pending claims are patentably distinct from the Tushie patent, whether considered by itself or in combination with the Sehr and/or Stimson patents. Reconsideration and withdrawal of the rejections, and allowance of all claims are respectfully requested.

Respectfully submitted,

BURNS, DOANE, SWECKER & MATHIS, L.L.P.

By: 
James A. LaBarre
Registration No. 28,632

P.O. Box 1404
Alexandria, Virginia 22313-1404
(703) 836-6620

Date: March 24, 2003

Attachment to Amendment dated March 24, 2003

Marked-up Copy

Replace the paragraph beginning on page 8, line 24, with the following:

--In this example embodiment, each [microporcessor] ~~microprocessor~~ TBP is equipped with two serial links LS, one LS to the computer PC and the other LLE to the reader/encoder LE. However, where the [microporcessor] ~~microprocessor~~ TBP is equipped not with two serial links but with an eight-conductor connector COS, as shown in Figure 2 for example, some of these conductors may be used for effecting serial links using an adaptation device DA which comprises two adaptors for serial connection SLA1, SLA2 and a switching circuit RS according to the diagram in Figure 2.--